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Attorneys for Plaintiff
CHERYL BUTLER-ADAMS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHERYL BUTLER-ADAMS,

Plaintiff,

v.

SPIRIT AIRLINES, INC., DAL GLOBAL
SERVICES, INC., and DOES ONE through ONE
HUNDRED, inclusive,

Defendants.

Case No. 14-CV-02761-JST

**AMENDED JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO CONTINUE
DISCOVERY AND PRETRIAL
CONFERENCE STATEMENT DATES**

1 Plaintiff CHERYL BUTLER-ADAMS and Defendant DAL GLOBAL SERVICES LLC, by and
2 through their respective counsel, hereby submit this amended stipulation to correct Docket Number 50
3 as follows:

4 1. The trial date currently set for this matter is April 11, 2016, with a pretrial conference set
5 for March 18, 2016.

6 2. The deadline to file a dispositive motion is November 23, 2015.

7 3. The current fact discovery cut-off is September 8, 2015.

8 4. The current expert discovery cut-off is October 31, 2015, with initial expert disclosures
9 due on September 28, 2015 and expert rebuttal disclosures due on October 19, 2015.

10 5. As currently scheduled, the close of discovery is over five months before trial, and the
11 pretrial conference is more than three and half months before the pretrial conference.

12 6. Following Plaintiff's initial day of deposition in June 2015, the parties collegially
13 commenced meet and confer efforts regarding outstanding discovery, as well as engaged in settlement
14 negotiations. Due to these ongoing discussions, the parties agreed to postpone Plaintiff's requested
15 depositions until August 2015.

16 7. Plaintiff now seeks the depositions of nine individuals, five of which are in the current
17 employ of Defendant. Three of the remaining four deponents are employees of Spirit Airlines, a
18 formerly named defendant in this matter who was dismissed in October 2014. Through no fault of the
19 parties, scheduling these depositions has proven difficult due to the need to coordinate multiple
20 witnesses and counsel, some of whom are located in Georgia and Florida.

21 8. To provide the parties sufficient time to pursue fact discovery prior to the deadline to file
22 dispositive motions, the parties mutually agree and stipulate to continue the fact discovery cut-off in this
23 matter to October 16, 2015.

24 9. Due to the extension of fact discovery, the parties further stipulate to continue the expert
25 discovery deadlines and the deadline to submit a pretrial statement, as set forth in the chart attached
26 hereto as **Exhibit A**.

27 10. None of these agreed upon extensions will alter the dispositive motion deadline, the
28 pretrial conference date, or the trial date.

11. Therefore, the parties stipulate to the amended case schedule, as set forth in **Exhibit A**.
IT IS SO STIPULATED.

DATED: September 1, 2015

Respectfully submitted,
SEYFARTH SHAW LLP

By: /s/ Chantelle C. Egan
Laura Maechtlen
Chantelle C. Egan
Attorneys for Defendant
DAL GLOBAL SERVICES, LLC

DATED: September 1, 2015

Respectfully submitted,
KAUPP & FEINBERG LLP

By: /s/ W. Gordon Kaupp
W. Gordon Kaupp
Beth Feinberg
Attorneys for Plaintiff
CHERYL BUTLER-ADAMS

ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)

I, Chantelle C. Egan, attest that concurrence in the filing of this document has been obtained
from the signatory W. Gordon Kaupp.

Executed this 1st day of September, 2015 in San Francisco, California.

By: /s/ Chantelle C. Egan
Chantelle C. Egan

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EXHIBIT A

EXHIBIT A

Event	Prior Operative Deadline	Requested New Operative Deadline
Fact discovery cut-off	9/8/15	10/16/15
Expert disclosures	9/28/15	12/10/15
Expert rebuttal	10/19/15	12/31/15
Expert discovery cut-off	10/31/15	1/15/16
Deadline to file dispositive motions	11/23/15	11/23/15
Pretrial conference statement due	12/7/15	2/18/16
Pretrial conference	3/18/16 at 2 p.m.	3/18/16 at 2 p.m.
Trial	4/11/16 at 8:30 a.m.	4/11/16 at 8:30 a.m.

~~PROPOSED~~ ORDER

Pursuant to the stipulation of the parties and good cause appearing, this Court ORDERS that the foregoing stipulation is binding. The Court hereby amends the case deadlines as follows:

Event	Prior Operative Deadline	New Operative Deadline
Fact discovery cut-off	9/8/15	10/16/15
Expert disclosures	9/28/15	12/10/15
Expert rebuttal	10/19/15	12/31/15
Expert discovery cut-off	10/31/15	1/15/16
Deadline to file dispositive motions	11/23/15	11/23/15
Pretrial conference statement due	12/7/15	2/18/16
Pretrial conference	3/18/16 at 2 p.m.	3/18/16 at 2 p.m.
Trial	4/11/16 at 8:30 a.m.	4/11/16 at 8:30 a.m.

This Order supersedes the Court's prior scheduling order, reflected in Docket Number 51.

IT IS SO ORDERED.

Dated: September 2, 2015

